



Order Filed on April 27, 2017
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Jeanette F. Frankenberg, Esq.
Stern, Lavinthal & Frankenberg, LLC
105 Eisenhower Parkway, Suite 302
Roseland, New Jersey 07068-0490
Telephone Number (973) 797-1100
Facsimile Number (973) 228-2679
Attorneys for Creditor
Seterus, Inc., as authorized sub-servicer for Federal
National Mortgage Association ("Fannie Mae"), a
corporation organized and existing under the laws of
the United States of America

In Re:

Natalie Gomez

Debtor

Judge: Christine M. Gravelle
Chapter 13
Hearing:
04/05/2017 at 10:00 AM

Case No.: 16-32333-CMG

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION

The consent order set forth on the following pages, numbered two (2) through three (3),
is hereby **ORDERED**.

DATED: April 27, 2017



Honorable Christine M. Gravelle
United States Bankruptcy Judge

Debtor: Natalie Gomez
Case No: 16-32333-CMG
Caption: Consent Order Resolving Objection to Confirmation

THIS MATTER having been brought before the Court by Robert C. Nisenson, Esq., attorney for the Debtor, Natalie Gomez ("Debtor"), upon the filing of a Chapter 13 Plan, and Seterus, Inc., as authorized sub-servicer for Federal National Mortgage Association ("Fannie Mae"), a corporation organized and existing under the laws of the United States of America, ("Secured Creditor"), by and through its attorneys, Stern, Laventhal & Frankenberg, LLC, having filed an Objection to the Confirmation of said Chapter 13 Plan, and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for good cause shown;

IT IS HEREBY ORDERED as follows:

1. The Trustee is authorized not to pay the secured arrearage claim of Secured Creditor so that Debtor can apply for, and potentially complete, a loan modification. Debtor's loan modification shall be approved no later than **July 27, 2017**.
2. If the loan modification is granted, Debtor shall file a Modified Plan, together with amended Schedule "J" reflecting Debtor's post loan modification budget, within thirty (30) days of approval of final loan modification.
3. If no loan modification is approved by **July 27, 2017** (or other date as extended by court order), Secured Creditor will promptly notify the Trustee, with copy to Debtor's attorney, and within thirty (30) days of such notification, the Debtor shall file one of the following:
 - a. A Modified Plan to cure the arrearage claim and any subsequent arrears to Secured Creditor; or a
 - b. Modified Plan to surrender the property subject to said claim; or a
 - c. Notice to Convert to Chapter 7; or a
 - d. Notice to Dismiss the Case.
4. Debtor's consent to entry of the within order does not waive his/her right to object to Secured Creditor's Proof of Claim pursuant to D.N.J. Local Bankruptcy Rule 3007-1(b).

Debtor: Natalie Gomez
Case No: 16-32333-CMG
Caption: Consent Order Resolving Objection to Confirmation

5. Debtor acknowledges that the monthly post-petition mortgage payment is subject to change in accordance with the terms of the note and mortgage. Furthermore, post-petition payments / trial period payments (if applicable) shall continue to be tendered outside the plan while the loan modification process is pending.
6. This Order shall be incorporated in and become part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,
content and entry of the within Order:



Robert C. Nisenson, Esq.
Attorney for the Debtor,
Natalie Gomez
Federal National Mortgage Association ("Fannie Mae"), a corporation organized and existing
under the laws of the United States of America

/s/ Jeanette F. Frankenberg, Esq.
Jeanette F. Frankenberg, Esq.
Attorney for Secured Creditor
Seterus, Inc., as authorized sub-servicer for